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TEAM: (CEPD)
XRef: 4221875
XRef: 4221874
XRef: 4221876
XRef: 4221872

**SUPERIOR COURT OF CALIFORNIA
COUNTY OF SACRAMENTO**

THE PEOPLE OF THE STATE OF CALIFORNIA,

vs.

GARY MICHAEL BOSTROM,
BRUCE NEAL HOAGLAND,
MICHAEL BRIAN MILLER, Individuals and
TECHLAND TESTING, INC, a California
Corporation

Defendant(s).

The People of the State of California upon oath of the undersigned, upon information and belief complain against the defendant(s) above named for the crime(s) as follows:

COUNT ONE

On or between November 11, 2003, and May 12, 2004, at and in the County of Sacramento, State of California, defendant(s) MICHAEL BRIAN MILLER did commit a felony namely: a violation of Section 115(a) of the Penal Code of the State of California, in that said defendant did unlawfully offer a false and forged instrument to be filed, registered, and recorded in the Air Resources Board, which instrument, if genuine, might be filed, registered, or recorded under any law of the State of California.

COUNT TWO

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charges set forth in Count One hereof: On or about and between October 08, 2003, and December 20, 2004, at and in the County of Sacramento, State of California,

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4 defendant(s) GARY MICHAEL BOSTROM did commit a felony namely: a violation of Section
5 115(a) of the Penal Code of the State of California, in that said defendant did unlawfully offer a
6 false and forged instrument to be filed, registered, and recorded in the Air Resources Board,
7 which instrument, if genuine, might be ~~filed~~, registered, or recorded under any law of the State
8 of California.
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11 **COUNT THREE**

12 For a further and separate cause of ~~action~~, being a different offense of the same class of crimes
13 and offenses as the charges set forth in Counts One and Two hereof: On or about September 22,
14 2004, at and in the County of Sacramento, State of California, defendant(s) BRUCE NEAL
15 HOAGLAND did commit a felony namely: a violation of Section 115(a) of the Penal Code of
16 the State of California, in that said defendant did unlawfully offer a false and forged instrument to
17 be filed, registered, and recorded in the Air Resources Board, which instrument, if genuine,
18 might be filed, registered, or recorded under any law of the State of California.
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22 **COUNT FOUR**

23 For a further and separate cause of action, being a different offense of the same class of crimes
24 and offenses as the charges set forth in Counts One through Three hereof: On or about and
25 between October 08, 2003, and December 20, 2004, at and in the County of Sacramento, State of
26 California, defendant(s) TECHLAND TESTING, INC did commit a felony namely: a violation
27 of Section 115(a) of the Penal Code of the State of California, in that said defendant did
28 unlawfully a false and forged instrument to be filed, registered, and recorded in the Air
29 Resources Board, which instrument, if genuine, might be filed, registered, or recorded under any
30 law of the State of California.
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34 **COUNT FIVE**

35 For a further and separate cause of action, being a different offense from but connected in its
36 commission as the charges set forth in Counts One through Four hereof: On or about and
37 between October 08, 2003, and December 20, 2004, at and in the County of Sacramento, State of
38 California, defendant(s) GARY MICHAEL BOSTROM, BRUCE NEAL HOAGLAND,
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4 MICHAEL BRIAN MILLER and TECHLAND TESTING, INC did commit a felony namely: a
5 violation of Section 182(a)(1) of the Penal Code of the State of California, in that said defendant
6 did unlawfully conspire together and with another person and persons whose identity is unknown
7 to commit the crime of procuring or offering false or forged instrument, in violation of Section
8 115(a) of the Penal Code, a felony; that pursuant to and for the purpose of carrying out the
9 objects and purposes of the aforesaid conspiracy, the said defendant(s) committed the following
10 overt act and acts at and in the County of Sacramento in furtherance of the conspiracy alleged in
11 Count Five.
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16 Overt Act No. 1: That in pursuance of said conspiracy, on October 30, 2003, GARY BOSTROM
17 signed a certification claiming to have performed a cargo tank certification test at the premises of
18 Sierra Energy in Ione, California.
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22 Overt Act No. 2: That in pursuance of said conspiracy, on or about October 30, 2003, an unknown
23 co-conspirator mailed the certification signed by GARY BOSTROM regarding the cargo tank
24 certification test at Sierra Energy to the Air Resources Board in Sacramento.
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27 Overt Act No. 3: That in pursuance of said conspiracy, on November 11, 2003, MICHAEL
28 MILLER signed a certification claiming to have performed a cargo tank certification test at General
29 Petroleum in Rancho Dominguez.
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32 Overt Act No. 4: That in pursuance of said conspiracy, on or about November 11, 2003, an
33 unknown co-conspirator mailed the certification signed by MICHAEL MILLER regarding the
34 cargo tank certification test at General Petroleum to the Air Resources Board in Sacramento.
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4 Overt Act No. 5: That in pursuance of said conspiracy, on November 11, 2003, MICHAEL
5 MILLER signed six certifications claiming to have performed cargo tank certification tests at
6 Jankovich Company in Paramount, California.
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10 Overt Act No. 6: That in pursuance of said conspiracy, on or about November 11, 2003, an
11 unknown co-conspirator mailed six certifications signed by MICHAEL MILLER regarding cargo
12 tank certification tests at Jankovich Company to the Air Resources Board in Sacramento.
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15 Overt Act No. 7: That in pursuance of said conspiracy, on November 13, 2003, MICHAEL
16 MILLER signed a certification claiming to have performed a cargo tank certification test at Leo's
17 Trucking at 21119 Wilmington Avenue in Carson.
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20 Overt Act No. 8: That in pursuance of said conspiracy, on or about November 13, 2003, an
21 unknown co-conspirator mailed the certification signed by MICHAEL MILLER regarding a cargo
22 tank certification test at Leo's Trucking in Carson to the Air Resources Board in Sacramento.
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25 Overt Act No. 9: That in pursuance of said conspiracy, on November 13, 2003, MICHAEL
26 MILLER signed a certification claiming to have performed a cargo tank certification test at
27 Espinoza Tank Lines, in Wilmington.
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31 Overt Act No. 10: That in pursuance of said conspiracy, on or about November 13, 2003, an
32 unknown co-conspirator mailed the certification signed by MICHAEL MILLER regarding the
33 cargo tank certification test at Espinoza Tank Lines to the Air Resources Board in Sacramento.
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36 Overt Act No. 11: That in pursuance of said conspiracy, on November 13, 2003, MICHAEL
37 MILLER signed a certification claiming to have performed two cargo tank certification tests at
38 M&J Tank Lines in Ventura.
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4 Overt Act No. 12: That in pursuance of said conspiracy, on or about November 13, 2003, an
5 unknown co-conspirator mailed the certification signed by MICHAEL MILLER regarding the
6 cargo tank certification test at M&J Tank Lines to the Air Resources Board in Sacramento.
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10 Overt Act No. 13: That in pursuance of said conspiracy, on December 10, 2003, MICHAEL
11 MILLER signed certifications claiming to have performed two cargo tank certification tests at Beck
12 Oil in Victorville.
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15 Overt Act No. 14: That in pursuance of said conspiracy, on or about December 10, 2003, an
16 unknown co-conspirator mailed the certifications signed by MICHAEL MILLER regarding the
17 cargo tank certification tests at Beck Oil to the Air Resources Board in Sacramento.
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20 Overt Act No. 15: That in pursuance of said conspiracy, on December 22, 2003, MICHAEL
21 MILLER signed two certifications claiming to have performed cargo tank certification tests at
22 Jankovich Company in Paramount.
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26 Overt Act No. 16: That in pursuance of said conspiracy, on or about December 22, 2003, an
27 unknown co-conspirator mailed the certifications signed by MICHAEL MILLER regarding the
28 cargo tank certification tests at Jankovich Company to the Air Resources Board in Sacramento, .
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31 Overt Act No. 17: That in pursuance of said conspiracy, on January 23, 2004, GARY BOSTROM
32 signed four certifications claiming to have performed cargo tank certification tests at Davies Oil in
33 Colusa.
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36 Overt Act No. 18: That in pursuance of said conspiracy, on or about January 23, 2004, an unknown
37 co-conspirator mailed the certifications signed by GARY BOSTROM regarding cargo tank
38 certification tests at Davies Oil to the Air Resources Board in Sacramento.
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4 Overt Act No. 19: That in pursuance of said conspiracy, on February 18, 2004, MICHAEL
5 MILLER signed four certifications claiming to have performed cargo tank certification tests at
6 General Petroleum in Rancho Dominguez.
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10 Overt Act No. 20: That in pursuance of said conspiracy, on or about February 18, 2004, an
11 unknown co-conspirator mailed the four certifications signed by MICHAEL MILLER regarding
12 cargo tank certification test at General Petroleum in Rancho Domingo to the Air Resources Board
13 in Sacramento.
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16 Overt Act No. 21: That in pursuance of said conspiracy, on April 7, 2004, MICHAEL MILLER
17 signed a certification claiming to have performed a cargo tank certification test in Independence,
18 California for the City of Los Angeles Department of Water and Power.
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21 Overt Act No. 22: That in pursuance of said conspiracy, on or about April 7, 2004, an unknown co-
22 conspirator mailed the certification signed by MICHAEL MILLER regarding a cargo tank
23 certification test in Independence for the Los Angeles Department of Water and Power to the Air
24 Resources Board in Sacramento.
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27 Overt Act No. 23: That in pursuance of said conspiracy, on May 12, 2004, MICHAEL MILLER
28 signed a certification claiming to have performed a cargo tank certification test at Jankovich
29 Company in Paramount.
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33 Overt Act No. 24: That in pursuance of said conspiracy, on or about May 12, 2004, an unknown co-
34 conspirator mailed the certification signed by MICHAEL MILLER regarding the cargo tank
35 certification test at Jankovich Company in Paramount to the Air Resources Board in Sacramento.
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4 Overt Act No. 25: That in pursuance of said conspiracy, on September 22, 2004, BRUCE
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6 HOAGLAND signed three certifications claiming to have performed cargo tank certification tests at
7 Sabek Transportation on Metz Road in King City.
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10 Overt Act No. 26: That in pursuance of said conspiracy, on or about September 22, 2004, an
11 unknown co-conspirator mailed the certifications signed by BRUCE HOAGLAND regarding the
12 cargo tank certification tests at Sabek Transportation to the Air Resources Board in Sacramento.
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15 Overt Act No. 27: That in pursuance of said conspiracy, on October 15, 2004, at 3217 E. Lorena in
16 Fresno, GARY BOSTROM performed a cargo tank certification test on cargo tank number 8041
17 that had not been degassed, and affixed a decal indicating a successful test to the cargo tank.
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20 Overt Act No. 28: That in pursuance of said conspiracy, on December 8, 2004, GARY BOSTROM
21 attached a "VK tag" to cargo tank CT 117054 indicating a successful cargo tank test when, in fact,
22 the cargo tank had not been degassed.
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25 Overt Act No. 29: That in pursuance of said conspiracy, on December 20, 2004, an unknown co-
26 conspirator attached decals indicating a successful inspection to a cargo tank at J.W. Myers, 27348
27 Avenue 14 in Madera, on a cargo tank that had not been degassed.
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31 That attached hereto and by this reference incorporated herein is a declaration setting forth facts in
32 support of probable cause for the issuance of a warrant of arrest herein.
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4 I declare upon information and belief and under penalty of perjury that the foregoing is true and
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6 correct.

7 Executed at Sacramento County, California, the 28th day of March, 2006.
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13 Declarant

14 SACRAMENTO COUNTY DISTRICT ATTORNEY

15 (916) 874-6218
16 Telephone Number
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19 CGS

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21 **HOLDING ORDER - DEFENDANT GARY MICHAEL BOSTROM**

22 _____ It appearing to me that the offense(s) in the within complaint has/have been committed,
23 and that there is sufficient cause to believe that the defendant, GARY MICHAEL BOSTROM,
24 is guilty thereof,

25 _____ The defendant, GARY MICHAEL BOSTROM, having waived preliminary hearing to
26 the offense(s) set forth in this complaint,
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28 Exceptions/Additions/Conditions: _____
29 _____
30 _____

31 I order that the defendant be held to answer to same. In my capacity as Judge of the Superior
32 Court, I deem the within complaint to be an Information and order it filed in the Superior
33 Court.
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36 Date: _____ Dept. _____
37 Judge of the Superior Court Sitting as Magistrate
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HOLDING ORDER - DEFENDANT BRUCE NEAL HOAGLAND

It appearing to me that the offense(s) in the within complaint has/have been committed, and that there is sufficient cause to believe that the defendant, BRUCE NEAL HOAGLAND, is guilty thereof,

The defendant, BRUCE NEAL HOAGLAND, having waived preliminary hearing to the offense(s) set forth in this complaint,

Exceptions/Additions/Conditions: _____

I order that the defendant be held to answer to same. In my capacity as Judge of the Superior Court, I deem the within complaint to be an Information and order it filed in the Superior Court.

Date: _____ Dept. _____
Judge of the Superior Court Sitting as Magistrate

HOLDING ORDER - DEFENDANT MICHAEL BRIAN MILLER

It appearing to me that the offense(s) in the within complaint has/have been committed, and that there is sufficient cause to believe that the defendant, MICHAEL BRIAN MILLER, is guilty thereof,

The defendant, MICHAEL BRIAN MILLER, having waived preliminary hearing to the offense(s) set forth in this complaint,

Exceptions/Additions/Conditions: _____

I order that the defendant be held to answer to same. In my capacity as Judge of the Superior Court, I deem the within complaint to be an Information and order it filed in the Superior Court.

Date: _____ Dept. _____
Judge of the Superior Court Sitting as Magistrate

HOLDING ORDER - DEFENDANT TECHLAND TESTING, INC

It appearing to me that the offense(s) in the within complaint has/have been committed, and that there is sufficient cause to believe that the defendant, TECHLAND TESTING, INC, is guilty thereof,

The defendant, TECHLAND TESTING, INC, having waived preliminary hearing to the offense(s) set forth in this complaint,

Exceptions/Additions/Conditions: _____

I order that the defendant be held to answer to same. In my capacity as Judge of the Superior Court, I deem the within complaint to be an Information and order it filed in the Superior Court.

Date: _____ Dept. _____
Judge of the Superior Court Sitting as Magistrate

DECLARATION IN SUPPORT OF ARREST WARRANT

(Made under 2015.5 CCP)

The undersigned hereby declares:

That your declarant is currently employed as a Deputy District Attorney for the County of Sacramento, State of California.

That pursuant to said employment, your declarant has been assigned to investigate allegations that, GARY MICHAEL BOSTROM, BRUCE NEAL HOAGLAND, MICHAEL BRIAN MILLER and TECHLAND TESTING, INC, did commit the crime(s) as set forth in the attached complaint.

That pursuant to said assignment, your declarant has contacted person(s) having knowledge of said offense(s) and who has/have prepared written reports and/or statements, and/or has received and read written reports and/or statements prepared by others known by your declarant to be law enforcement officers, all of which reports and/or statements are included in a report consisting of 29 page(s) which is attached hereto as Exhibit I and incorporated by references as though fully set forth.

That each of these documents is presently an official record of a law enforcement agency.

WHEREFORE, your declarant prays that a warrant issue for the arrest of the hereinabove-named defendant(s) and that said defendant(s) be dealt with according to law.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on the 28th day of March, 2006, Sacramento, California.



Declarant

901 G Street,

Sacramento, California 95814

Sacramento County District Attorney